

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 15-CR-356 (RHK)

| | | |
|---------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | DEFENDANT’S MOTION |
| |) | FOR A DOWNWARD VARIANCE |
| | | AND/OR DEPARTURE |
| v. |) | |
| |) | |
| Malah Austin Mehn, |) | |
| |) | |
| Defendant. |) | |

The Defendant, Malah Austin Mehn, by and through his attorney, Patrick W. Flanagan, requests that after the Court determines the sentencing range applicable under the Sentencing Guidelines, and after it applies the 18 U.S.C. 3553(a) sentencing factors, that it consider either a Departure under §5K2.0 – Departures Based On Circumstances Of A Kind Not Adequately Taken Into Consideration, or a variance from the guidelines and sentence him as requested in his Position Memorandum Regarding Sentencing.

Dated: August 24, 2017

Respectfully submitted,

s/Patrick W. Flanagan
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